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16 ALVARION LTD., ZVI SLONIMSKY,
17 TZVI FRIEDMAN, AND DAFNA GRUBER
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

15 AMNON MEIR, On Behalf of Himself and All)
16 Others Similarly Situated,) CASE NO.: C 07-0374 JSW
17 Plaintiff,)
18 vs.)
19 ALVARION LTD., ZVI SLONIMSKY,)
20 DAFNA GRUBER AND MEIR BAREL,)
21 Defendants.)
22)
23 MANFRED HACKER, On Behalf of Himself)
24 and All Others Similarly Situated,) Case No. 07-00719-JSW
25 Plaintiff,)
26 vs.)
27 ALVARION LTD, ZVI SLONIMSKY,)
28 DAFNA GRUBER AND MEIR BAREL,)
Defendants.)
STIPULATION AND [PROPOSED]
ORDER CONSOLIDATING CASES
AND CONTINUING CASE
MANAGEMENT CONFERENCE
CMC Date: September 21, 2007
Time: 1:30 p.m.
Courtroom: 2
Before: Hon. Jeffrey S. White

STIP AND [PROPOSED] ORDER CONSOLIDATING
CASES AND CONTINUING CMC
No. C-07-0374-JSW; NO. C-07-00719-JSW; AND NO C-07-
02602-JSW

1)
2 IRVING BRAUN, On Behalf of Himself and All) Case No. 07-02602-JSW
3 Others Similarly Situated,)
4 Plaintiff,)
5 vs.)
6 ALVARION LTD., ZVI SLONIMSKY, TZVI)
7 FRIEDMAN AND DAFNA GRUBER,)
8 Defendants.)
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1 WHEREAS, each of the above-captioned cases is a purported class action governed by
 2 the provisions of the Private Securities Litigation Reform Act of 1995 (“PSLRA”);

3 WHEREAS, the three above-captioned substantially similar class actions have all been
 4 deemed related, along with a fourth class action titled *Berger v. Alvarion, Ltd., et al.*, Case No. C
 5 07-02601-JSW, (see Docket for *Meir v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW (“*Meir*
 6 Docket”) No. 62);

7 WHEREAS, on April 9, 2007, three motions to consolidate all four actions and for
 8 appointment as Lead Plaintiff pursuant to Section 21(D) of the PSLRA were filed in the first-
 9 filed *Meir* case (*Meir* Docket Nos. 15, 17 and 21);

10 WHEREAS, on August 14, 2007, Rahul Saraf and the Harel Group, which consists of the
 11 Harel Insurance Company Ltd., filed a Stipulation re Appointment of Lead Plaintiffs and Lead
 12 Counsel (*Meir* Docket No. 51), in which two of the lead plaintiff movants requested
 13 consolidation of the four class actions and agreed to serve as Co-Lead Plaintiffs in this action;¹

14 WHEREAS, on September 20, 2007, plaintiff Paul Berger filed a Notice of Voluntary
 15 Dismissal of his separate action, *Berger v. Alvarion Ltd., et al.* (Case No. C 07-02601-JSW);

16 WHEREAS, all named plaintiffs in each of the above three remaining related cases agree
 17 that the cases should be consolidated, and defendants Alvarion Ltd., Zvi Slonimsky, Tvzi
 18 Friedman and Dafna Gruber likewise agree that these three remaining cases should be
 19 consolidated (see Stipulation re Appointment of Lead Plaintiffs and Lead Counsel, *Meir* Docket
 20 No. 51; and Defendants’ Joinder in Plaintiffs’ Request for Consolidation, filed September 4,
 21 2007, *Meir* Docket No. 63);

22 WHEREAS, the three cases are scheduled for Case Management Conferences (“CMCs”)
 23 on September 21, 2007 at 1:30 p.m., but no lead plaintiff has been appointed who can speak for
 24 the plaintiff class, and thus all the parties agree that the CMCs would be premature at this time;

26 ¹ On September 20, 2007, movant Harel Insurance Co. Ltd. withdrew its application to be
 27 appointed lead plaintiff. See Notice of Withdrawal, filed September 20, 2007, *Meir* Docket No.
 71. However, the remaining signatories to this stipulation, movants Saraf and Khan, continue to
 seek appointment as co-lead plaintiffs. See *id.*

1 IT IS HEREBY STIPULATED AND AGREED, by (a) Defendants Alvarion, Zvi
2 Slonimsky, Tzvi Friedman and Dafna Gruber, by and through their counsel, (b) plaintiff Amnon
3 Meir, by and through his counsel (c) plaintiff Manfred Hacker, by and through his counsel, and
4 (d) plaintiff Irving Braun, by and through his counsel, that:

5 (1) The three above-captioned related cases should be consolidated under the above-
6 captioned *Meir v. Alvarion Ltd., et al.* case (Case No. C 07-00374-JSW);

7 (2) The Case Management Conference currently scheduled for September 21, 2007,
8 at 1:30 p.m. should be taken off calendar and rescheduled at another time convenient for the
9 Court after a lead plaintiff has been appointed who can speak for the plaintiff class.

10 Dated: September 20, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

11 By: _____ /s/ Joni Ostler
12 Joni Ostler

13 Attorneys for Defendants Alvarion Ltd., Zvi
14 Slonimsky, Tzvi Friedman and Dafna Gruber

15 Dated: September 20, 2007

GLANCY BINKOW & GOLDBERG LLP

16 By: _____ /s/ Andy Sohn
Andy Sohn

17 Attorneys for Plaintiffs Amnon Meir and the Harel
18 Group

19 Dated: September 20, 2007

SCOTT + SCOTT, LLC

20 By: _____ /s/ Arthur L. Shingler, III
Arthur L. Shingler, III

21 Attorneys for Plaintiff Manfred Hacker

22 Dated: September 20, 2007

COUGHLIN STOIA GELLER RUDMAN
ROBBINS LLP

23 By: _____ /s/ Mario Alba
Mario Alba

24 Attorneys for Plaintiff Irving Braun

ORDER

Pursuant to Stipulation, it is hereby ordered that:

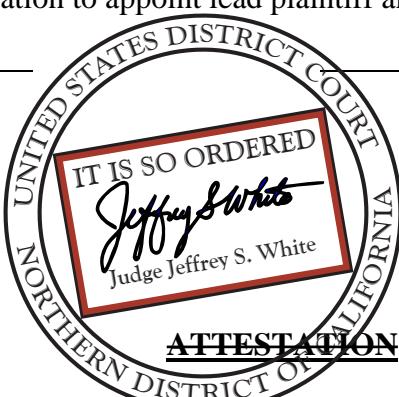
(1) The three related cases titled *Meir v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW; *Hacker v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW; and *Braun v. Alvarion Ltd. et al.*, Case No. C 07-02602-JSW, are all consolidated under the first-filed *Meir v. Alvarion Ltd., et al.* case;

(2) The Case Management Conference currently scheduled for September 21, 2007,
should be taken off calendar and rescheduled for November 9, 2007 at 1:30 p.m. Plaintiffs
Shall file a motion or stipulation to appoint lead plaintiff and lead counsel by no later than
October 12, 2007.
Beted:

Dated.

**The Honorable Jeffrey S. White
United States District Court Judge**

12 | Dated: September 20, 2007



15 I, Joni Ostler, am the ECF user whose identification and password are being used to file
16 the STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES AND
17 CONTINUING CASE MANAGEMENT CONFERENCE. In compliance with General Order
18 45.X.B, I hereby attest that Andy Sohrn; Arthur L. Shingler, III; and Mario Alba have each
19 concurred in this filing.

20 || Dated: September 20, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joni Ostler
Joni Ostler